

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN

ALBERT PATTERSON d/b/a  
WORLD WRESTLING ASSOCIATION,  
SUPERSTARS OF WRESTLING, INC. and  
d/b/a W.W.A. SUPERSTARS

Plaintiff

v.

TVN ENTERTAINMENT CORPORATION,  
GENERAL COMMUNICATIONS, INC.,  
EBATES SHOPPING.COM, INC.,  
MUSCATINE POWER & WATER (MPW) CABLE)  
AMAZON.COM, INC., EPINIONS.COM  
PPVN NETWORK HOLDING, INC.  
PAR-PER-VIEW NETWORK. INC.  
TNA ENTERTAINMENT, LL.C. and  
MUZE, INC.

Defendants

No. 04 C 0192

JURY TRIAL DEMANDED

MAGISTRATE JUDGE  
WILLIAM E. CALLAHAN

**PLAINTIFF'S FRCP 26(a)(1) & (2) DISCLOSURES**

To: Douglas A. Donnell and Jenifer A. Puplava  
MIKA MEYERS BECKETT & JONES, PLC.  
900 Monroe Ave.  
Grand Rapids, MI 49503

Pursuant to FRCP 26(a) (1) and (2) , Plaintiff. Albert Patterson d/b/a WORLD WRESTLING ASSOCIATION, SUPERSTARS OF WRESTLING, INC. and d/b/a W.W.A. SUPERSTARS, discloses the following information. Patterson has not completed his discovery or investigation in this case. The responses herein are based on information presently known to Patterson, and Patterson reserves the right to produce or introduce at trial any and all new information that may subsequently be found through investigation or discovery.

**DISCLOSURES**

Pursuant to FRCP 26(a)(1), Plaintiff may use the following persons at trial to present



evidence under Rules 702, 703, or 705 of the Federal Rules of Evidence:

Rule 26(a)(1)(A) Individuals likely to have discoverable information.

The people having knowledge as to the allegations in the complaint are:

Albert Patterson, plaintiff who can be contacted through counsel.

Other individuals with knowledge include:

Harold Naboisek, master of ceremonies at wrestling events.

Jeff May, wrestling entertainer.

Jessie Reed

Peter Graves is a technician that works with Mr. Patterson to prepare videos of the events performed by the WORLD WRESTLING ASSOCIATION of his wrestling events.

Lavelle Nash will testify that in 1992 he started video taping interviews by the WORLD WRESTLING ASSOCIATION with the wrestling performers.

Messers Naboisek, May, Reed, Graves and Nash may be contacted through plaintiff's counsel for their depositions. These individuals have knowledge of plaintiff's early and first use of the marks. Jeff May was an early Superstar of Wrestling and does special events and Harold Nabiosek was an early announcer and still performs this role. Jessie Reed is the Treasurer of the World Wrestling Association, Superstars of Wrestling, Inc.

Frank Romano and Jeff Jarrett may have discoverable information.

Rule 26(a)(1)(B) Documents relevant to the allegations in the pleadings.

All documents attached to the complaint as Exhibits. There are thousands of documents relevant to the litigation and to the extent those documents may be produced (are not subject to a protective order), they are immediately available to defendant TNA for inspection and or photocopy.

Rule 26(a)(1)(C) The computation of damages will be made on the basis of the Plan documents and the participants service records. No such documents specifically calculating the damages are in the possession or control of the plaintiff at this time.

Rule 26(a)(1)(D) No insurance documents are in the possession of the plaintiff.

Pursuant to FRCP 26(a)(2), Plaintiff may use the following persons at trial to present evidence under Rules 702, 703, or 705 of the Federal Rules of Evidence:

Dennis Ward.

Investigation continues.

Dated: April 27, 2005

ALBERT PATTERSON

By:

  
His Attorney

CHARLES DRAKE BOUTWELL  
3075 Plum Island Drive  
Northbrook, Illinois 60062  
847-272-2126  
847-272-2275 [Facsimile]

**CERTIFICATE OF SERVICE**

The undersigned, an attorney, certifies that on April 27, 2005, he caused a copy of the foregoing **PLAINTIFF'S RULE 26(A) (1)& (2) DISCLOSURES** to be served by regular U. S. Mail upon the following to:

Douglas A. Donnell and Jenifer A. Puplava  
MIKA MEYERS BECKETT & JONES, PLC.  
900 Monroe Ave.  
Grand Rapids, MI 49503

By:

  
His Attorney